



May 22, 2023

VIA ECF

The Honorable Sarah Netburn
S.D.N.Y. Thurgood Marshall Courthouse
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deebbs-Elkenaney et. al.*, 1:22 Civ 02435 (LLS)(SN)

Dear Judge Netburn:

We represent Defendants Tracy Wolff, Entangled Publishing, Macmillan, and Universal City Studios, and write jointly with counsel for Defendants Emily Sylvan Kim and Prospect Agency pursuant to Rule III. D of Your Honor's Individual Practices regarding filing redacted documents under seal and in connection with the parties' Protective Order (ECF No. 50) and the Second Circuit's opinion in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Defendants filed under seal Exhibits B-H to their May 22, 2023 letter requesting a conference. These exhibits consist of the parties' respective expert reports, which have all been marked as confidential.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

By: /s/ Benjamin S. Halperin

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